

1 Jacob K. Danziger (SBN 278219)
2 **ARENTOFOX SCHIFF LLP**
3 44 Montgomery Street, 38th Floor
4 San Francisco, CA 94104 United States
5 Telephone: (734) 222-1516
6 Facsimile: (415) 757-5501
7 jacob.danziger@afslaw.com

8 Beth A. Wilkinson (*pro hac vice*)
9 Rakesh N. Kilaru (*pro hac vice*)
10 Kieran Gostin (*pro hac vice*)
11 Calanthe Arat (SBN 349086)
12 Tamarra Matthews Johnson (*pro hac vice*)
13 **WILKINSON STEKLOFF LLP**
14 2001 M Street NW, 10th Floor
Washington, DC 20036
Telephone: (202) 847-4000
Facsimile: (202) 847-4005
bwilkinson@wilkinsonstekloff.com
rkilaru@wilkinsonstekloff.com
kgostin@wilkinsonstekloff.com
carat@wilkinsonstekloff.com
tmatthewsjohnson@wilkinsonstekloff.com

15 Attorneys for Defendant
16 NATIONAL COLLEGIATE ATHLETIC ASSOCIATION

17 [Additional Counsel Listed on Signature Page]

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **OAKLAND DIVISION**

21 IN RE COLLEGE ATHLETE NIL
22 LITIGATION

23 Case No. 4:20-cv-03919-CW

24 **STIPULATION AND ~~PROPOSED~~
25 ORDER EXTENDING CERTAIN CASE
DEADLINES**

26 Trial Date: 2025-01-27
27 Judge: Hon. Claudia Wilken

1 Pursuant to Northern District of California Local Rule 7-12, Plaintiffs in the above-
 2 captioned action and Defendants National Collegiate Athletic Association, Atlantic Coast
 3 Conference, The Big Ten Conference, Inc., The Big 12 Conference, Inc., Pac-12 Conference, and
 4 Southeastern Conference (collectively, “Defendants,” and together with Plaintiffs, the “Parties”),
 5 by and through their respective undersigned counsel, submit the following Stipulation seeking an
 6 order extending certain case deadlines:

7 WHEREAS, on April 7, 2023, the Court set a schedule for Dispositive Motion Briefing
 8 (ECF No. 243);

9 WHEREAS, on April 4, 2024, Plaintiffs filed their dispositive and Daubert motions (ECF
 10 Nos. 414 and 415);

11 WHEREAS, the Parties agree that modifying certain upcoming case deadlines related to
 12 dispositive and *Daubert* motions is mutually beneficial;

13 WHEREAS, the Parties’ proposed deadline extensions will *not* impact the hearing
 14 currently docketed for September 19, 2024 (“Hearing on all Dispositive and Daubert motions as
 15 to merits experts and further case management conference”) or any other subsequent deadlines;

16 THEREFORE, THE PARTIES, THROUGH THEIR RESPECTIVE COUNSEL OF
 17 RECORD, HEREBY STIPULATE, SUBJECT TO COURT APPROVAL, THAT:

18 The Court issue an order modifying the case deadlines as follows:

20 EVENT	21 CURRENT DATE	22 PROPOSED 23 DATE
24 Defendants’ (1) Opposition to Plaintiffs’ Dispositive Motion and <i>Daubert</i> Motions and (2) Cross-Dispositive Motion and <i>Daubert</i> Motions (to be filed in a single brief not to exceed 70 pages)	25 May 17, 2024	26 June 21, 2024
27 Plaintiffs’ (1) Reply in Support of their Dispositive Motion and <i>Daubert</i> Motions and (2) Opposition to Defendants’ Cross-Dispositive Motion and <i>Daubert</i> Motions (to be filed in a single brief not to exceed 80 pages)	28 June 28, 2024	July 26, 2024

1 2 EVENT	3 CURRENT DATE	4 PROPOSED DATE
5 Defendants' Reply in Support of their 6 Cross-Dispositive Motion and <i>Daubert</i> 7 Motions (to be filed in a single brief not to 8 exceed 60 pages)	9 July 26, 2024	10 August 23, 11 2024
12 Hearing on all dispositive and Daubert motions as to 13 merits experts and further case management conference	14 September 19, 2024	15 <i>Same</i>
16 Motions in Limine (single brief of 25 pages or less)	17 November 22, 2024	18 <i>Same</i>
19 Oppositions to Motions in Limine (single brief of 25 20 pages or less)	21 December 6, 2024	22 <i>Same</i>
23 Pretrial Conference	24 December 16, 2024	25 <i>Same</i>
26 Trial Date	27 January 27, 2025	28 <i>Same</i>

1 Dated: May 6, 2024

2 **WILKINSON STEKLOFF LLP**

3 By: /s/ Rakesh N. Kilaru

4 Beth A. Wilkinson (*pro hac vice*)

5 Rakesh N. Kilaru (*pro hac vice*)

6 Kieran Gostin (*pro hac vice*)

7 Calanthe Arat (SBN 349086)

8 Tamarra Matthews Johnson (*pro hac vice*)

9 Matthew R. Skanchy (*pro hac vice*)

10 2001 M Street NW, 10th Floor

11 Washington, DC 20036

12 Telephone: (202) 847-4000

13 Facsimile: (202) 847-4005

14 bwilkinson@wilkinsonstekloff.com

15 rkilaru@wilkinsonstekloff.com

16 kgostin@wilkinsonstekloff.com

17 carat@wilkinsonstekloff.com

18 tmatthewsjohnson@wilkinsonstekloff.com

19 mskanchy@wilkinsonstekloff.com

20 Jacob K. Danziger (SBN 278219)

21 ARENTFOX SCHIFF LLP

22 44 Montgomery Street, 38th Floor

23 San Francisco, CA 94104

24 Telephone: (734) 222-1516

25 Facsimile: (415) 757-5501

26 jacob.danziger@afslaw.com

27 Attorneys for Defendant

28 NATIONAL COLLEGIATE ATHLETIC

ASSOCIATION

Respectfully Submitted,

COOLEY LLP

By: /s/ Whitty Somvichian

Whitty Somvichian (SBN 194463)

Kathleen R. Hartnett (SBN 314267)

Ashley Kemper Corkery (SBN 301380)

3 Embarcadero Center, 20th Floor

San Francisco, California 94111-4004

Telephone: (415) 693-2000

Facsimile: (415) 693-2222

wsomvichian@cooley.com

khartnett@cooley.com

acorkery@cooley.com

Mark Lambert (SBN 197410)

3175 Hanover Street

Palo Alto, CA 94304-1130

Telephone: (650) 843-5000

Facsimile: (650) 849-7400

mlambert@cooley.com

Dee Bansal (*pro hac vice*)

1299 Pennsylvania Ave. NW, Suite 700

Washington, DC 20004-2400

Telephone: (202) 842 7800

Facsimile: (202) 842 7899

dbansal@cooley.com

Attorneys for Defendant

PAC-12 CONFERENCE

1 **MAYER BROWN LLP**

2 By: /s/ Britt M. Miller
3 Britt M. Miller (*pro hac vice*)
4 Daniel T. Fenske (*pro hac vice*)
5 71 South Wacker Drive
6 Chicago, IL 60606
7 Telephone: (312) 782-0600
8 Facsimile: (312) 701-7711
9 bmiller@mayerbrown.com
10 dfenske@mayerbrown.com

11 Christopher J. Kelly (SBN 276312)
12 Two Palo Alto Square, Suite 300
13 3000 El Camino Real
14 Palo Alto, CA 94306
15 Telephone: (650) 331-2000
16 Facsimile: (650) 331-2060
17 cjkelly@mayerbrown.com

18 Attorneys for Defendant
19 THE BIG TEN CONFERENCE, INC.

20 **SIDLEY AUSTIN LLP**

21 By: /s/ Angela C. Zambrano
22 David L. Anderson (SBN 149604)
23 555 California Street, Suite 2000
24 San Francisco, CA 94104
25 Telephone: (415) 772-1200
26 Facsimile: (415) 772-7412
27 dlanderson@sidley.com

28 Angela C. Zambrano (*pro hac vice*)
1 Natali Wyson (*pro hac vice*)
2 Chelsea A. Priest (*pro hac vice*)
3 2021 McKinney Avenue, Suite 2000
4 Dallas, TX 75201
5 Telephone: (214) 969-3529
6 Facsimile: (214) 969-3558
7 angela.zambrano@sidley.com
8 nwyson@sidley.com
9 cpriest@sidley.com

10 Attorneys for Defendant
11 THE BIG 12 CONFERENCE, INC.

1 **ROBINSON, BRADSHAW & HINSON,**
2 **P.A.**

3 By: /s/ Robert W. Fuller
4 Robert W. Fuller, III (*pro hac vice*)
5 Lawrence C. Moore, III (*pro hac vice*)
6 Amanda P. Nitto (*pro hac vice*)
7 Travis S. Hinman (*pro hac vice*)
8 Patrick H. Hill (*pro hac vice*)
9 101 N. Tryon St., Suite 1900
10 Charlotte, NC 28246
11 Telephone: (704) 377-2536
12 Facsimile: (704) 378-4000
13 rfuller@robinsonbradshaw.com
14 lmoore@robinsonbradshaw.com
15 anitto@robinsonbradshaw.com
16 thinman@robinsonbradshaw.com
17 phill@robinsonbradshaw.com

18 Mark J. Seifert (SBN 217054)
19 SEIFERT ZUROMSKI LLP
20 One Market Street, 36th Floor
21 San Francisco, California 941105
22 Telephone: (415) 999-0901
23 Facsimile: (415) 901-1123
24 mseifert@szllp.com

25 Attorneys for Defendant
26 SOUTHEASTERN CONFERENCE

27 **LATHAM & WATKINS LLP**

28 By: /s/ Christopher S. Yates
1 Christopher S. Yates (SBN 161273)
2 Aaron T. Chiu (SBN 287788)
3 505 Montgomery Street, Suite 2000
4 San Francisco, CA 94111
5 Telephone: (415) 391-0600
6 Facsimile: (415) 395-8095
7 chris.yates@lw.com
8 aaron.chiu@lw.com

9 Anna M. Rathbun (SBN 273787)
10 555 Eleventh Street, NW, Suite 1000
11 Washington, DC 20004
12 Telephone: (202) 637-1061
13 Facsimile: (202) 637-2201
14 anna.rathbun@lw.com

15 **FOX ROTHSCHILD LLP**

16 By: /s/ D. Erik Albright
17 D. Erik Albright (*pro hac vice*)
18 Jonathan P. Heyl (*pro hac vice*)
19 Gregory G. Holland (*pro hac vice*)
20 230 North Elm Street, Suite 1200
21 Greensboro, NC 27401
22 Telephone: (336) 378-5368
23 Facsimile: (336) 378-5400
24 ealbright@foxrothschild.com
25 jheyel@foxrothschild.com
26 gholland@foxrothschild.com

27 Attorneys for Defendant
28 THE ATLANTIC COAST
1 CONFERENCE

1 **WINSTON & STRAWN LLP**

2 By: /s/ Jeffrey L. Kessler
3 JEFFREY L. KESSLER

4 Jeffrey L. Kessler (*pro hac vice*)
5 David G. Feher (*pro hac vice*)
6 David L. Greenspan (*pro hac vice*)
7 Adam I. Dale (*pro hac vice*)
8 Sarah L. Viebrock (*pro hac vice*)
9 200 Park Avenue
10 New York, NY 10166-4193
11 Telephone: (212) 294-4698
12 Facsimile: (212) 294-4700
13 jkessler@winston.com
14 dfeher@winston.com
15 dgreenspan@winston.com
16 aidale@winston.com
17 sviebrock@winston.com
18
19 Jeanifer E. Parsigian (SBN 289001)
20 101 California Street, 34th Floor
21 San Francisco, CA 94111-5840
22 Telephone: (415) 591-1000
23 Facsimile: (415) 591-1400
24 jparsigian@winston.com
25
26
27
28

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Steve W. Berman
STEVE W. BERMAN

Steve W. Berman (*pro hac vice*)
Emilee N. Sisco (*pro hac vice*)
Stephanie Verdoia (*pro hac vice*)
1301 Second Avenue, Suite 2000
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
steve@hbsslaw.com
emilees@hbsslaw.com
stephaniev@hbsslaw.com

Benjamin J. Siegel (SBN 256260)
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000
Facsimile: (510) 725-3001
bens@hbsslaw.com

Attorneys for Plaintiffs and the Proposed Classes

SIGNATURE CERTIFICATION

I, Rakesh N. Kilaru, am the CM/ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Extending Certain Case Deadlines. In compliance with Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: May 6, 2024

Respectfully submitted,

WILKINSON STEKLOFF LLP

By: /s/ Rakesh N. Kilaru
Rakesh N. Kilaru
Attorney for Defendant
National Collegiate Athletic Association

PROPOSED ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: 5/6/2024

THE HONORABLE CLAUDIA WILKEN
United States District Court Judge